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IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

LUCKY LAKE FARM & WATER LIMITED  
PARTNERSHIP, a Saskatchewan Limited  
Partnership; and SWIFT RIVER FARMS  
LTD., an Alberta corporation;

Plaintiffs,

vs.

GORDON CLARK, an individual; *et al.*,

Defendants.

Case No.: 2:23-cv-01768-GMN-MDC

**STIPULATION AND [PROPOSED]  
ORDER REGARDING EXTENDING  
TEMPORARY RESTRAINING ORDER,  
EXTENDING TEMPORARY  
RESTRAINING ORDER, AND  
EXTENDING TIME FOR  
DEFENDANTS GORDON CLARK,  
RODNEY KOCH, CINDY LOU ELLEN  
KOCH, KRYSTAL LEE CLARK, LA  
BELLA VITA INTERNATIONAL,  
EQUINE SALES, LLC, TW  
INTERNATIONAL INVESTMENTS,  
LTD., LIQUID LUXURY GROUP, LLC,  
AND BLACKSTONE LUXURY GROUP,  
LLC TO FILE RESPONSIVE  
PLEADING TO FIRST AMENDED  
COMPLAINT**

Plaintiffs LUCKY LAKE FARM & WATER LIMITED PARTNERSHIP and SWIFT RIVER FARMS LTD. and Defendants GORDON CLARK, RODNEY KOCH, CINDY LOU ELLEN KOCH, KRYSTAL LEE CLARK, LA BELLA VITA INTERNATIONAL EQUINE SALES, LLC, TW INTERNATIONAL INVESTMENTS, LTD., LIQUID LUXURY GROUP, LLC, and BLACKSTONE LUXURY GROUP, LLC (collectively “Certain Defendants”<sup>1</sup>), by and through their respective counsel, hereby stipulate and agree to the following:

<sup>1</sup> Defendants GORDON CLARK, RODNEY KOCH, CINDY LOU ELLEN KOCH, and KRYSTAL LEE CLARK shall be referred to herein as “TRO Defendants.”

**PROCEDURAL BACKGROUND**

1  
2 1. On November 13, 2023, this Court entered a Temporary Restraining Order  
3 (Docket No. 9) freezing the assets of TRO Defendants, including real properties located at 6214  
4 Desert Flora Avenue, Las Vegas, Nevada (APN: 125-23-612-033) (“Desert Flora Property”) and  
5 6172 Luna View Avenue, Las Vegas, Nevada (APN: 125-23-612-033) (“Luna View Property”).  
6 The Temporary Restraining Order was set to expire on November 27, 2023, at 5:00 p.m.

7 2. On November 16, 2023, Plaintiffs filed an Ex Parte Motion to Extend Expiration  
8 of Temporary Restraining Order and Corresponding Deadlines [First Request] (Docket No. 17)  
9 to extend the expiration of the Temporary Restraining Order to December 4, 2023, at 5:00 p.m.  
10 On November 17, 2023, this Court entered a Minute Order in Chambers (Docket No. 21)  
11 extending the Temporary Restraining Order expiration to November 29, 2023, at 5:00 p.m.

12 3. On December 5, 2023, Plaintiffs filed their First Amended Complaint (Docket  
13 No. 30).

14 4. On December 7, 2023, Plaintiffs and TRO Defendants filed a Stipulation and  
15 [Proposed] Order Extending Temporary Restraining Order [First Request] (Docket No. 32)  
16 whereby the parties agreed to extend the Temporary Restraining Order (ECF 9) to expire on  
17 February 13, 2024, at 5:00 p.m., as well as extending TRO Defendants’ time to respond to  
18 Plaintiffs’ Motion for Preliminary Injunction to January 26, 2024, with Plaintiffs’ Reply being  
19 extended to February 2, 2024. The Court filed the Order Extending Temporary Restraining Order  
20 on December 7, 2023 (Docket No. 33).

21 5. On December 19, 2023, Plaintiffs and TRO Defendants filed a Stipulation and  
22 [Proposed] Order Extending Time for Defendants Gordon Clark, Rodney Koch, Cindy Lou Ellen  
23 Koch, and Krystal Lee Clark to File Answer to First Amended Complaint [First Request] (Docket  
24 No. 34) extending TRO Defendants’ time to answer the First Amended Complaint to January 9,  
25 2024. The Court filed the Order Extending Time for Defendants Gordon Clark, Rodney Koch,  
26 Cindy Lou Ellen Koch, and Krystal Lee Clark to File Answer to First Amended Complaint on  
27 December 20, 2023 (Docket No. 35).

28 6. On January 9, 2024, Plaintiffs and TRO Defendants filed a Stipulation and  
29 [Proposed] Order Extending Time for Defendants Gordon Clark, Rodney Koch, Cindy Lou Ellen

1 Koch, and Krystal Lee Clark to File Answer to First Amended Complaint [Second Request]  
2 (Docket No. 37) extending TRO Defendants' time to answer the First Amended Complaint to  
3 February 9, 2024. The Court filed the Order Extending Time for Defendants Gordon Clark,  
4 Rodney Koch, Cindy Lou Ellen Koch, and Krystal Lee Clark to File Answer to First Amended  
5 Complaint on January 11, 2024 (Docket No. 38).

6 7. On January 23, 2024, Plaintiffs and TRO Defendants filed a Stipulation and  
7 [Proposed] Order Extending Temporary Restraining Order [Third Request<sup>2</sup>] (Docket No. 41)  
8 whereby the parties agreed to extend the Temporary Restraining Order (ECF 9) to expire on April  
9 15, 2024, at 5:00 p.m., as well as extending TRO Defendants' time to respond to Plaintiffs'  
10 Motion for Preliminary Injunction to March 28, 2024, with Plaintiffs' Reply being extended to  
11 April 4, 2024. The Court filed the Order Extending Temporary Restraining Order on January  
12 23, 2024 (Docket No. 42).

13 8. On January 25, 2024, the Court entered a Minute Order in Chambers (Docket No.  
14 52) extending the hearing related to the Plaintiffs' Motion for Preliminary Injunction to April 15,  
15 2024, at 10:00 a.m.

16 9. On February 1, 2024, Defendants LA BELLA VITA INTERNATIONAL  
17 EQUINE SALES, LLC, TW INTERNATIONAL INVESTMENTS, LTD., LIQUID LUXURY  
18 GROUP, LLC, and BLACKSTONE LUXURY GROUP, LLC ("Waiver Defendants"), filed  
19 Waivers of Service (Docket Nos. 55-58), which were dated January 24, 2024. As such, Waiver  
20 Defendants' responsive pleadings to the First Amended Complaint (Docket No. 30) was due  
21 March 25, 2024.

22 10. Plaintiffs and Defendant LA BELLA VITA EQUESTRIANS, LLC ("Dismissed  
23 Defendant") entered into a Stipulation for Dismissal wherein it was stipulated and agreed upon  
24 that Dismissed Defendant would be dismissed from this action on March 12, 2024 (Docket No.  
25 65).

26 11. The Court entered its Order Granting Stipulation to Dismiss Defendant La Bella  
27 Vista Equestrian, LLC Without Prejudice on March 12, 2024 (Docket No. 66).

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28 <sup>2</sup> This was inadvertently titled a third request, when it should have been a second request.



with the parties working together, on or about February 15, 2024, the Desert Flora Property was sold. Further, the Luna View Property is listed for sale with the intent to sell the Luna View Property pursuant to the Settlement Agreement. Accordingly, the parties stipulated and agreed to modify the Temporary Restraining Order (Docket No. 9) to remove the provision that enjoins TRO Defendants from “transferring, selling, disposing, pledging, assigning, or encumbering the real and personal property,” including the Desert Flora Property, in the Stipulation and Order Regarding modifying Temporary Restraining Order, Extending Temporary Restraining Order, and Extending Time for Defendants Gordon Clark, Rodney Koch, Cindy Lou Ellen Koch, Krystal Lee Clark, La Bella Vita International, Equine Sales, LLC, TW International Investments, Ltd., Liquid Luxury Group, LLC, and Blackstone Luxury Group, LLC to File Responsive Pleading to First Amended Complaint. *See* Docket No. 9, p. 3, Ins. 2-9 and Docket No. 68. The remaining provisions of the Temporary Restraining Order shall remain in effect.

15. As Plaintiffs and Certain Defendants continue to work towards a settlement of this matter, they further stipulate and agree as follows:

a. to extend Certain Defendants up to and including July 23, 2024, to file their responsive pleading.

i. TRO Defendants’ and Waiver Defendants’ current deadline was May 24, 2024.

ii. This is the fourth request of the parties to extend the responsive pleading deadline of TRO Defendants and the second request for Waiver Defendants.

b. to extend the expiration of the Temporary Restraining Order (Docket No. 9) from June 14, 2024, at 5:00 p.m. until August 13, 2024, at 5:00 p.m.

i. This is the parties’ fourth request to extend this deadline.

c. to extend the deadline for TRO Defendants’ Response to Plaintiffs’ Motion for Preliminary Injunction to July 29, 2024, by 5:00 p.m. with Plaintiffs’ Reply being due on August 2, 2024, by 5:00 p.m.

i. TRO Defendants’ Response to Plaintiffs’ Motion for Preliminary Injunction is currently May 29, 2024, at 5:00 p.m.;

ii. Plaintiffs’ Reply is currently due June 3, 2024, at 5:00 p.m.;

iii. This is the parties' fourth request to extend this deadline.

16. The parties are engaged in settlement discussions, and continue to move forward with the terms of their settlement in good faith, and therefore agree to these additional extensions. This Stipulation is made in good faith and for good cause and not for any purpose of delay or harm.

Dated this 29<sup>th</sup> day of May, 2024.

Dated this 29<sup>th</sup> day of May, 2024.

ALDRICH LAW FIRM, LTD.

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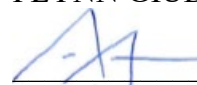
*KOCH, KRYSTAL LEE CLARK, LA BELLA*

*VITA INTERNATIONAL EQUINE SALES,*

*LLC, TW INTERNATIONAL INVESTMENTS,*

*LTD., LIQUID LUXURY GROUP, LLC, and*

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**ORDER**

**IT IS SO ORDERED.**

**IT IS FURTHER ORDERED** that the motion hearing set for June 10, 2024, at 11:00

a.m. is **CONTINUED to August 12, 2024, at 3:00 p.m.** in LV Courtroom 7D before

Judge Gloria M. Navarro.

**No further extensions relating to the Temporary Restraining Order or pending**

**Motion for Preliminary Injunction will be granted.**

DATED: May 29, 2024